

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of San Diego  
Gas & Electric Company and Southern  
California Gas Company for Authority to  
Integrate Their Gas Transmission Rates,  
Establish Firm Access Rights, and Provide Off-  
System Gas Transportation Services

A.04-12-004

**COMMENTS OF  
AERA ENERGY LLC AND  
MIDWAY SUNSET COGENERATION COMPANY  
ON PROPOSED AND ALTERNATE DECISIONS**

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November 20, 2006

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Pursuant to Rule 14.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Aera Energy LLC (Aera) and Midway Sunset Cogeneration Company (MSCC) submit these comments on the Proposed Decision and Alternate Decision (PD/AD) supporting the proposal of Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) for authority to establish firm access rights (FARs) and off-system delivery services. Aera/MSCC ask the Commission to make a minor modification to the body of the decision to provide clarity regarding the treatment of EOR contracts in the open season process. Clarification of the PD/AD's discussion of EOR contracts will prevent misunderstandings that are likely to arise from the language currently provided in the decision. Aera/MSCC believe that the proposed clarification is consistent with the intent of the PD/AD. Proposed changes to the PD/AD are set forth in Appendix A.

**I. A MINOR MODIFICATION IS REQUIRED TO CLARIFY TREATMENT OF EOR CONTRACT REVENUES**

Over 18 years ago, Aera and MSCC executed negotiated, long-term gas transportation agreements with SoCalGas and the contracts will not expire for several years. To conform the existing agreements to the operation of a new rights allocation system in a way that will preserve the contract bargain and avoid discrimination, Aera/MSCC requested that the Commission permit EOR contract holders to participate in the firm rights open season in Step 2, as all other noncore customers will be permitted to do, and to acquire these rights on the same basis afforded other noncore customers. Aera/MSCC asked that SoCalGas be required to credit the revenues received for backbone transmission services against the negotiated bundled contract rate of the long-term EOR contract holders in the same way the utilities propose to do for tariffed customers.

The PD/AD correctly stated the issue -- Aera and MSCC asked to be permitted to acquire FARs under the same terms and conditions as other customers in Step 2 and to receive the reservation charge credit against their firm long term contract.<sup>1</sup> The decisions also correctly noted SoCalGas' resistance to the crediting mechanism because the utility believed that EOR contracts were interruptible for the purpose of end use curtailment priority<sup>2</sup> and would only credit interruptible revenues against the bundled EOR contract rate. If Aera/MSCC acquired firm access rights, the firm revenues would not be credited against the bundled contract rate.

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<sup>1</sup> PD/AD at 31.

<sup>2</sup> PD/AD at 32.

The PD/AD make it clear that Aera/MSCC can participate in Step 2 and will be treated like other noncore customers.<sup>3</sup> On this point, both Aera/MSCC and SoCalGas have agreed. The PD/AD continues that *“Aera and MSCC should be entitled to the credit of the FAR reservation charge if they take firm transmission service. Aera and MSCC should not receive the credit-back of the FAR reservation credit if Aera and MSCC are only receiving interruptible transmission service. They should, however, receive a credit-back of any interruptible access charge if Aera and MSCC take interruptible transmission service. SDG&E and SoCalGas shall apply the credit-back mechanism in the manner we described.”*<sup>4</sup> It is with this statement, particularly the use of the term “transmission,” that confusion arises.

The logic of the Commission regarding the treatment of reservation revenues from EOR contract holders could be demonstrated as:

**Acquisition of Firm Access Right =  
Firm Access Rate Credited Against Contract Rate**

**Acquisition of Interruptible Access Right =  
Interruptible Access Rate Credited Against Contract Rate**

Aera and MSCC have no disagreement with the logic presented above.

However, the crux of the issue is whether the current Aera/MSCC contract is “interruptible.” SDG&E and SoCalGas “believe” that the bargain struck in the EOR contracts was only for interruptible service and therefore interruptible long-term contract holders should be treated differently than long-term contracts for

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<sup>3</sup> PD/AD at 98.

<sup>4</sup> PD/AD at 99.

firm service.<sup>5</sup> As provided in the Aera/MSCC opening brief, there is no basis for treating EOR customers differently and that end-use curtailment priorities should not be used as the means to discriminate against certain customers. In the discussion of the issues, the PD/AD “agreed” with Aera/MSCC *“that one’s curtailment priority has no relationship to a customer’s gas nominations.”*<sup>6</sup>

To clarify the decision, the body of the decision should be modified as follows (insertions are underlined, deletions are in strike-out):

We agree with the argument of Aera and MSCC that one’s curtailment priority has no relationship to a customer’s gas nominations. Aera and MSCC should be entitled to participate in the open season steps as other noncore customers. SDG&E and SoCalGas should ~~the credit of the FAR reservation charges received for firm access rights against the bundled contract rate of the long-term EOR contract holders in the same way the utilities propose to do for tariffed customers.~~ if they take firm transmission service. ~~Aera and MSCC should not receive the credit back of the FAR reservation credit if Aera and MSCC are only receiving interruptible transmission service. They should, however, receive a credit back of any interruptible access charge if Aera and MSCC take interruptible transmission service.~~ SDG&E and SoCalGas shall apply the firm FAR credit-back mechanism in the manner we described.<sup>7</sup>

As EOR customers, Aera and MSCC pay a single, bundled transmission rate that includes backbone, distribution, fuel and other related services. The clarification provided above removes the contract issue from the discussion. The language makes clear that SoCalGas and SDG&E should not discriminate against EOR contract holders.

Aera and MSCC are also members of the Indicated Producers, who have advocated in their contemporaneous comments the unbundling of the 5 cent reservation charge in lieu of the PD’s proposed “credit back” mechanism. Aera

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<sup>5</sup> SDG&E/SoCalGas Opening Brief at 57.

<sup>6</sup> PD/AD at 98.

<sup>7</sup> PD/AD at 98-99.

and MSCC urge the adoption of this proposal. In the event this proposal is adopted, however, the body of the decision concerning the EOR contracts should be modified as follows:

We agree with the argument of Aera and MSCC that one's curtailment priority has no relationship to a customer's gas nominations. SoCalGas should unbundle the 5 cent reservation charge from the Aera and MSCC contract rates in the same manner as these charges are unbundled from the rates of other customers. This will place Aera and MSCC in the same position as other customers, permitting them to elect firm access rights in the amount and at the locations of their choosing without the risk of duplicative charges. ~~should be entitled to the credit of the FAR reservation charge if they take firm transmission service. Aera and MSCC should not receive the credit back of the FAR reservation credit if Aera and MSCC are only receiving interruptible transmission service. They should, however, receive a credit back of any interruptible access charge if Aera and MSCC take interruptible transmission service.~~ SDG&E and SoCalGas shall apply the firm FAR credit-back mechanism in the manner we described.

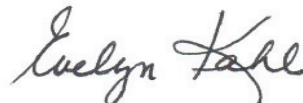
## **II. CONCLUSION**

Aera/MSCC respectfully request that the Commission modify the PD/AD at this time, to clarify the ability of EOR contract holders to participate in the open season process as all other noncore customers will be permitted to do and to have the revenues, whether they be firm or interruptible, credited against the bundled contract rate. If the Commission adopts an unbundled FAR proposal, SoCalGas should be required to unbundle the backbone transmission costs from

the EOR contracts in the same way those costs are unbundled from the bundled transportation rates of other customers to derive a non-transmission transportation rate.

Respectfully submitted,

ALCANTAR & KAHL

A handwritten signature in cursive script, reading "Evelyn Kahl".

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Evelyn Kahl

Counsel to Aera Energy LLC and  
Midway Sunset Cogeneration  
Company

Dated: November 20, 2006

## **APPENDIX A**



## Modifications to Proposed and Alternate Decision

Note: insertions are underlined and deletions are in strike-out.

### IV.G.e)(2)(e) Step 2 Modifications

Next, we address how the long term EOR contracts of Aera and MSCC should be treated under the FAR proposal. Aera and MSCC expressed concern that it was not clear if they would be permitted to bid in Step 2 for FAR capacity. Exhibit 16 made it clear that Aera and MSCC would be treated like other noncore customers and would be permitted to bid for FAR capacity in Step 2.

Aera and MSCC assert that if they are able to obtain FAR or interruptible receipt point access service, that they should receive a dollar-for-dollar credit-back of the charge for the FAR or the charge for the interruptible service.

In the event Aera and MSCC obtain and pay for the FAR reservation charge, SDG&E and SoCalGas propose that Aera and MSCC not receive a credit-back. SDG&E and SoCalGas consider these contracts to be interruptible contracts, and therefore no credit-back of the FAR reservation charge is warranted because of the interruptible nature of the contract. Aera and MSCC contend that the interruptible nature of their contracts was for end-use curtailment purposes only.

We agree with the argument of Aera and MSCC that one's curtailment priority has no relationship to a customer's gas nominations. Aera and MSCC should be entitled to participate in the open season steps as other noncore customers. SDG&E and SoCalGas should the credit of the FAR reservation charges received for firm access rights against the bundled contract rate of the long-term EOR contract holders in the same way the utilities propose to do for tariffed customers if they take firm transmission service. ~~Aera and MSCC should not receive the credit back of the FAR reservation credit if Aera and MSCC are only receiving interruptible transmission service. They should, however, receive a credit back of any interruptible access charge if Aera and MSCC take interruptible transmission service.~~ SDG&E and SoCalGas shall apply the credit-back mechanism in the manner we described.<sup>8</sup>

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<sup>8</sup> PD/AD at 98-99.

## **Modifications to Proposed and Alternate Decision if Modified to Include Unbundled Proposal**

Note: insertions are underlined and deletions are in strike-out.

### **IV.G.e)(2)(e) Step 2 Modifications**

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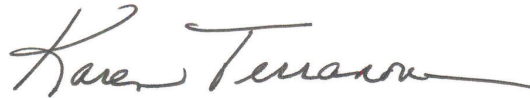
In the event Aera and MSCC obtain and pay for the FAR reservation charge, SDG&E and SoCalGas propose that Aera and MSCC not receive a credit-back. SDG&E and SoCalGas consider these contracts to be interruptible contracts, and therefore no credit-back of the FAR reservation charge is warranted because of the interruptible nature of the contract. Aera and MSCC contend that the interruptible nature of their contracts was for end-use curtailment purposes only.

We agree with the argument of Aera and MSCC that one's curtailment priority has no relationship to a customer's gas nominations. SoCalGas should unbundle the 5 cent reservation charge from the Aera and MSCC contract rates in the same manner as these charges are unbundled from the rates of other customers. This will place Aera and MSCC in the same position as other customers, permitting them to elect firm access rights in the amount and at the locations of their choosing without the risk of duplicative charges. ~~should be entitled to the credit of the FAR reservation charge if they take firm transmission service. Aera and MSCC should not receive the credit back of the FAR reservation credit if Aera and MSCC are only receiving interruptible transmission service. They should, however, receive a credit-back of any interruptible access charge if Aera and MSCC take interruptible transmission service.~~ SDG&E and SoCalGas shall apply the firm FAR credit-back mechanism in the manner we described.

## CERTIFICATE OF SERVICE

I, Karen Terranova hereby certify that I have on this date caused the attached **Comments of Aera Energy LLC and Midway Sunset Cogeneration Company on Proposed and Alternate Decisions** in A04-12-004 to be served to all known parties by either United States mail or electronic mail, to each party named in the official attached service list obtained from the Commission's website, attached hereto, and pursuant to the Commission's Rules of Practice and Procedure.

Dated November 20, 2006 at San Francisco, California.

A handwritten signature in dark ink, appearing to read "Karen Terranova", with a long horizontal flourish extending to the right.

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Karen Terranova

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